

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Jeffrey L. Leckrone, Debtor)	Case No. 16-44399
)	
)	Chapter 13
)	
_____)	
Maria Moehle,)	The Roach Law Firm
)	Susan K. Roach
Creditor)	W. Edwin Roussin
)	Gordon K. Rea
vs.)	Attorneys for Plaintiff
)	8000 Maryland Avenue, Suite 760
Jeffrey Leckrone,)	Clayton, MO 63105
)	(314) 434-7272
Debtor)	Sroach@susanroachlaw.com
)	

CREDITOR MARIA MOEHLE'S MOTION TO DISMISS

COMES NOW, the Plaintiff, Maria Moehle, by and through her attorneys, The Roach Law Firm by W. Edwin Roussin and Gordon K. Rea, and requests this Court dismiss Debtor's petition for a Chapter 13 bankruptcy. In support of this motion, the undersigned states, as follows:

1. This is Debtor's second Chapter 13 petition, this effort having been reinstated on or about September 23, 2016 (36).
2. Creditor Maria Moehle filed her objections to confirmation of this plan on December 15, 2016 (53).
3. An Order granting Creditor Maria Moehle's 2004 Examination of Debtor issued on December 9, 2016 (48). That hearing was continued to a date to be arranged by consent of the parties due to the ice storm of Friday, January 13, 2017.
4. The Debtor, failed or refused to comply with the demands for information by the

Trustee.

5. The Trustee filed Objections to Confirmation on January 6, 2017 (55).
6. The undersigned Creditor seeks finality in this matter for the reasons stated in her Objections to Confirmation (53).
7. But for the Debtor's frivolous filing of his petition herein, and the Debtor's repeated failure or refusal to meet the Trustee's requirements, Creditor Maria Moehle would not have incurred substantial attorney's fees and costs herein.

WHEREFORE, Creditor Maria Moehle, by the undersigned counsel, requests this Court Dismiss the Debtor's petition with prejudice, award Creditor Maria Moehle her reasonable attorney's fees, and for such other relief as may seem fitting to this Court in these circumstances.

Respectfully submitted,

THE ROACH LAW FIRM



SUSAN K. ROACH, #30081

W. EDWIN ROUSSIN, #24258

GORDON K. REA

#60466MO

Attorney for Respondent

8000 Maryland Ave., Suite 760

Clayton, MO 63105

(314) 434-7272; fax: (314) 863-6653

CERTIFICATE OF SERVICE

On this 18th day of JANUARY in the year 2017 the undersigned e-filed a true and accurate copy of the foregoing pursuant to Federal and Local Rule, and also served a copy upon the individuals below by the means indicated below.

TO:

Trustee

John V. LaBarge, Jr., Esq.
Chapter 13 Trustee
P.O. 430908
St. Louis, MO 63143
(314) 781-8100
Email: standing_trustee@ch13stl.com

For Debtor Jeffrey L. Leckrone

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X E-Filing/PACER System



GORDON K. REA

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